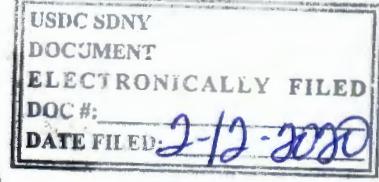


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION  
OF THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX  
REFUND SCHEME LITIGATION,

This document relates to: 1:18-cv-05053; 1:18-cv-05374; 1:18-08655; 1:18-cv-09797; 1:18-cv-10100



MASTER DOCKET

Case No. 1:18-md-02865-LAK

**STIPULATION EXTENDING TIME  
TO RESPOND TO AMENDED  
THIRD-PARTY COMPLAINT**

Third-Party Plaintiffs the Goldstein Law Group PC 401(k) Profit Sharing Plan and Sheldon Goldstein (the “Goldstein Parties”); DW Construction, Inc. Retirement Plan, Kamco Investments, Inc. Pension Plan, Kamco LP Profit Sharing Pension Plan, Linden Associates Defined Benefit Plan, Moira Associates LLC 401K Plan, Riverside Associates Defined Benefit Plan, American Investment Group of New York, L.P. Pension Plan, Stacey Kaminer, Joan Schulman, and David Schulman (the “Utah Parties”); Newsong Fellowship Church 401(k) Plan and Alexander Jamie Mitchell, III (the “Newsong Parties”); and Del Mar Asset Management Savings and Retirement Plan, Federated Logistics LLC 401K Plan, and David Freelove (the “Del Mar Parties” and collectively with the Goldstein Parties, the Utah Parties, and the Newsong Parties, the “Third-Party Plaintiffs”), and Third-Party Defendant, ED&F Man Capital Markets, Ltd. (“ED&F Man” or “Third-Party Defendant”), by and through their undersigned attorneys, hereby stipulate and agree as follows:

**WHEREAS** on November 5, 2019 the Goldstein Parties filed their Amended Answer, Affirmative Defenses, and Counterclaims Against Skatteforvaltningen and Amended Third-Party Complaint against ED&F Man Capital Markets, Ltd. and John Does 1-10 (Dkt. 219);

**WHEREAS** on August 12, 2019 Utah Parties filed their Amended Third-Party Complaint on November 13, 2019 (Dkt. 226);

**WHEREAS** the Newsong Parties filed their Amended Third-Party Complaint on November 12, 2019 (Dkt. 225);

**WHEREAS** on November 12, 2019 the Del Mar Parties filed their Third-Party Complaint against ED&F (Dkt. 220);

**WHEREAS** ED&F Man and the Third-Party Plaintiffs have agreed that ED&F Man will file a pleading responsive to each of the Third-Party Complaints on or before March 2, 2020;

**WHEREAS** this is the second request to adjourn ED&F Man's date to answer the Goldstein Third-Party Complaint following the Court's decision on ED&F Man's motion to dismiss the Goldstein Third-Party Complaint;

**WHEREAS** this is the third request to modify ED&F Man's response date to the Utah Third-Party Complaint, the Newsong Third-Party Complaint, and the Del Mar Third-Party Complaint; and

**WHEREAS** ED&F Man and the Third-Party Plaintiffs will not suffer any prejudice by this request;

**NOW THEREFORE**, the Parties hereby stipulate and agree that ED&F Man will serve a responsive pleading to each of the aforementioned Third-Party Complaints on or before March 1, 2020.

Dated: February 11, 2020

GUSRAE KAPLAN NUSBAUM PLLC  
120 Wall Street, 25<sup>th</sup> Floor  
New York, NY 10005  
(212) 269-1400

AKERMAN LLP  
666 Fifth Avenue, 20th Floor  
New York, NY 10103  
(212) 880-3800

By: /s/ Kari Parks  
*Attorneys for the Goldstein Parties*

By: /s/ Brian S. Fraser  
*Attorneys for Third-Party Defendant  
ED&F Man Capital Markets, Ltd.*

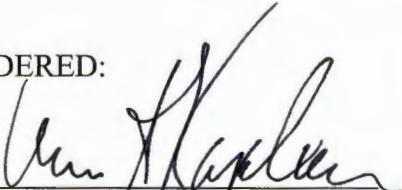
K&L GATES LLP  
State Street Financial Center  
One Lincoln Street  
Boston, MA 02111  
(617) 261-3100

By: /s/ Brandon R. Dillman  
*Attorneys for the Utah Parties and the Newsong Parties*

KOSTELANETZ & FINK LLP  
7 World Trade Center, 34<sup>th</sup> Floor  
New York, NY 10007  
(212) 808-8100

By: /s/ Bryan Skarlatos  
*Attorneys for the Del Mar Parties*

SO ORDERED:

  
\_\_\_\_\_  
United States District Judge

2/12/2020